

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARIA D. CONTRERAS, as	§	
<i>Representative of the ESTATE OF</i>	§	
GERARDO CONTRERAS; and	§	
JOSE A. CONTRERAS	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	CIVIL ACTION NO: 2:19-cv-00133
	§	JURY TRIAL
CITY OF CORPUS CHRISTI, TEXAS	§	
PEDRO YBARRA, Individually;	§	
LONNIE JACKSON, Individually;	§	
PHILIP MARTINEZ, Individually;	§	
JERRY LOCKHART, Individually;	§	
DANA ROBBINS, Individually;	§	
JOHN/JANE DOE #6, Individually;	§	
JOHN/JANE DOE #7, Individually; AND	§	
JOHN/JANE DOE #8, Individually	§	
<i>Defendants</i>	§	

AFFIDAVIT OF OFFICER DANA ROBBINS

I, Dana Robbins, an Officer for the City of Corpus Christi Police Department, being duly sworn on oath, state as follows:

1. "I am currently a Police Officer with the City of Corpus Christi Police Department. I have been a police officer with CCPD for approximately two (2) years, with a hire date of July 16, 2017.
2. "I have received training through the Corpus Christi Police Academy and through the Field Training Officer (FTO) program. I have also received training from working with other officers and continuing education through CCPD."
3. "On March 22, 2018, I was informed by dispatch of a call involving a man with a gun."
4. "My partner Senior Officer Ybarra and I responded to 2917 Masterson Drive in Corpus Christi, Texas, where dispatch informed us the incident was occurring."

5. "Upon arrival, the man who I later learned was Mr. Contreras, was observed sitting on the front porch on the ground."
6. "My partner, Senior Officer Ybarra, and I asked him to show us his hands and get on his stomach."
7. "Senior Officer Ybarra went hands on and tried to get Mr. Contreras away from the corner so we could determine whether he had a weapon."
8. "Mr. Contreras was resisting, so I went hands on as well and attempted to help Senior Officer Ybarra in detaining Mr. Contreras."
9. "Mr. Contreras was still not compliant, so Senior Officer Ybarra directed me to tase Mr. Contreras once he was moved enough to expose his back."
10. "I, Officer Dana Robbins, then used my taser, one cycle, aiming toward his back to gain compliance, so we could secure the handcuffs."
11. "Officer Phillip Martinez stepped in to assist and I stepped back."
12. "Once Senior Officer Ybarra was finally able to handcuff one of Mr. Contreras' hands, I stepped back in to get Mr. Contreras' other arm into cuffs."
13. "Senior Officer Ybarra then called for medics, who were already on scene."
14. "The medics approached and dragged Mr. Contreras away from the door, and started to initiate care."
15. "I did not personally, nor did I hear another Officer, make any statement like 'got him good' during the incident."
16. "I did not witness any CCPD Police Officer step on or strike Mr. Contreras' head."
17. "I believe the force utilized by myself and the additional CCPD Officers involved was reasonable, necessary and in compliance with Corpus Christi Police Department policies."

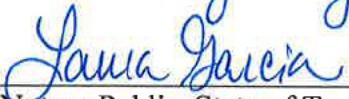
18. "I was placed on administrative leave as a result of the incident, and complied with all requirements and requests pursuant to the CCPD internal affairs investigation."
19. "I, Officer Dana Robbins, hereby swear under oath that the information set forth in this affidavit is true and correct to the best of my knowledge, information and belief, and that I make this oath under the penalty of perjury."



Affiant

Personally, appeared before me the above-named Dana Robbins and made oath as to the truth of the foregoing affidavit signed by Dana Robbins.

Signed and sworn before me this 15th day of January, 2020.



Laura Garcia
Notary Public, State of Texas

